

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

LEAGUE OF WOMEN VOTERS OF
MICHIGAN, ROGER J. BRDAK,
FREDERICK C. DURHAL, JR., JACK
E. ELLIS, DONNA E. FARRIS, WILLIAM
“BILL” J. GRASHA, ROSA L. HOLLIDAY,
DIANA L. KETOLA, JON “JACK” G.
LASALLE, RICHARD “DICK” W. LONG,
LORENZO RIVERA and RASHIDA
H. TLAIB,

Case No. 17-cv-14148

Hon. Eric L. Clay
Hon. Denise Page Hood
Hon. Gordon J. Quist

Plaintiffs,

v.

RUTH JOHNSON, in her official capacity
as Michigan Secretary of State,

Defendant.

**AMENDED NOTICE OF TAKING FED. R. CIV. P. 30(B)(6) DEPOSITION
OF THE LEAGUE OF WOMEN VOTERS OF MICHIGAN**

TO PLAINTIFFS AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on September 11, 2018, beginning at 9:00 a.m. E.D.T., Defendant Secretary of State Ruth Johnson (“Defendant”) shall take, pursuant to Fed. R. Civ. P. 30(b)(6), the deposition by oral examination of the League of Women Voters of Michigan (the “League”) at the offices of Dickinson Wright PLLC, 350 S. Main St., #300, Ann Arbor, MI 48104, before a court reporter. The deposition shall continue day-to-day until completed.

SUBJECTS OF TESTIMONY

Please provide a representative or representatives of the League to testify about information known or reasonably available to the League, related to the following subjects:

1. [This subject has been removed based on supplemental discovery responses provided by Counsel on August 31, 2018.]

2. As to each district in the enacted Michigan 2011 Apportionment Plan that Plaintiffs challenge as a partisan gerrymander, the identity of the League's member(s) or the named Plaintiff, if any, harmed with respect to such district, and, as to each such member or Plaintiff:

- a. The harm suffered by that member as a result of the shape of their district in the 2011 Apportionment Plan;
- b. The proposed alternative district plan for that member; and
- c. How such proposed alternative district plan would redress the injury suffered by the member.

The representative is requested to bring with them a hardcopy of proposed alternative district plans, and any non-privileged analysis in their possession relating to same.

Respectfully submitted,
DICKINSON WRIGHT PLLC

Dated: September 4, 2018

/s/ Ryan M. Shannon
Ryan M. Shannon
Attorneys for Defendant

Certificate of Service

I, the undersigned, certify that on September 4, 2018, copies of the foregoing document were served on counsel for the parties as listed below via U.S. Mail:

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/s/ Ryan M. Shannon
Ryan M. Shannon

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